

C. STANLEY HUNTERTON
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HUNTERTON & ASSOCIATES
627 So. 7th St.
Las Vegas, Nevada 89101
(702-388-0098)
Counsel for Defendant Keith Michael Costa

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	CASE NO. 2:10-CR-578-PMP-GWF
)	
LINDA LIVOLSI, aka LINDA G.)	
FINDLEY, aka LINDA GROGG and)	
WILLIAM LIVOLSI, JR.,)	
)	
Defendants.)	
_____)	

STIPULATION TO CONTINUE
(first request by William Livolsi, Jr.)

IT IS HEREBY STIPULATED AND AGREED by and between DANIEL G. BOGDEN, United States Attorney, through GREGORY DAMM, Assistant United States Attorney, C. STANLEY HUNTERTON, counsel for Defendant WILLIAM LIVOLSI, JR., and MONIQUE KIRTLEY, counsel for LINDA LIVOLSI that the trial date in this matter presently set for June 3, 2014 at the hour of 9:00 am, and the calendar call presently set for May 28, 2014, 2014 at the hour of 9:30 am as well as the February 14, 2014 date currently set as the time for William Livolsi, Jr. to file pre-trial motions shall all be continued.

This Stipulation is entered into for the following reasons:

1. The Defendant William Livolsi, Jr. is not incarcerated and does not object to the continuance.

2. Defendant William Livolsi was charged in a Superseding Indictment which was returned on January 7, 2014.

3. Counsel for Defendant William Livolsi, Jr. was appointed to represent said Defendant on January 15, 2014.

4. According to the Court's electronic filing system (Pacer), arraignment and plea has been scheduled for March 26, 2014 as to Defendant Linda Livolsi.

5. The two (2) Defendants should be on the same schedule in order to promote the efficient administration of justice.

6. The parties agree to the continuance.

7. Denial of this request for continuance would deny counsel for Defendant William Livolsi, Jr. sufficient time within which to be able to effectively and thoroughly prepare Motions taking into account the exercise of due diligence.

8. For all of these reasons, the ends of justice would best be served by a continuance of the Motions dates and trial.

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9. The additional time requested in this Stipulation is excludable under the Speedy Trial Act, 18 U.S.C. § 3161.

DATED this _____ day of February, 2014.

HUNTERTON & ASSOCIATES

DANIEL G. BOGDEN
UNITED STATES ATTORNEY

_____/s/_____
C. Stanley Hunterton
627 So. 7th St.
Las Vegas, Nevada 89101
Counsel for Defendant Keith Michael Costa

_____/s/_____
Gregory Damm
333 Las Vegas Blvd. So. #5000
Las Vegas, NV 89101
Counsel for Plaintiff

FEDERAL PUBLIC DEFENDER

_____/s/_____
Monique Kirtley
411 E. Bonneville, Suite 250
Las Vegas, NV 89101
Counsel for Defendant Linda Livolsi

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	
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Plaintiff,)	
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vs.)	CASE NO. 2:10-CR-578-PMP-GWF
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LINDA LIVOLSI, aka LINDA G.)	
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WILLIAM LIVOLSI, JR.,)	
)	
Defendants.)	
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FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

Based on the pending Stipulation of counsel and good cause appearing therefore, the Court finds that:

1. The Defendants William Livolsi, Jr. and Linda Livolsi, are not incarcerated and do not object to the continuance.
2. The parties have respectfully suggested that both defendants be on the same Motion and Trial schedule.
3. Counsel for Defendant William Livolsi, Jr. was recently appointed to represent said Defendant on January 15, 2014.
4. This is the first request by Defendant William Livolsi, Jr. for a continuance of the Motions and Trial dates.
5. The parties agree to the continuance.
6. Denial of this request for continuance would deny counsel for the Defendant sufficient time within which to be able to effectively and thoroughly prepare Motions taking into account the exercise of due diligence.

7. For all of these reasons, the ends of justice would best be served by a continuance of the Motions and Trial dates.

8. The additional time requested in this Stipulation is excludable under the Speedy Trial Act, 18 U.S.C. § 3161.

For all of the above reasons, the ends of justice would best be served by a continuance of the Motions date.

CONCLUSIONS OF LAW

Denial of this request for continuance would deny counsel for Defendant William Livolsi, Jr. sufficient time within which to be able to effectively and thoroughly prepare Motions taking into account the exercise of due diligence.

The efficient administration of justice is best served by having both Defendants on the same schedule.

The additional time requested in this Stipulation is excludable under the Speedy Trial Act, 18 U.S.C. Section 3161 is not implicated.

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ORDER

IT IS FURTHER ORDERED that Dispositive Motions are due on the 12th day of,
July, 2014;

IT IS FURTHER ORDERED that Trial in this matter is set for October 21, 2014 at
the hour of 9:00 AM. Calendar Call is set for October 15, 2014 at the hour of
9:00 AM.

DATED this 13th day of February, 2014.


UNITED STATES DISTRICT JUDGE